

INCUMBENT WORKER TRAINING

PRACTICES AND PROCEDURE MANUAL

Missouri Department of Higher Education and Workforce
Development

Office of Workforce Development

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INTRODUCTION TO INCUMBENT WORKER TRAINING

Incumbent Worker Training (IWT) is an employer driven training service that provides employers with the opportunity to build and maintain a quality workforce. IWT can be used to either

1. Help avert potential layoffs of employees, or
2. Obtain the skills necessary to retain employment, such as increasing the skill levels of employees so they can be promoted within the company and create backfill opportunities for less-skilled employees.

Target populations for IWT would be businesses and employers who meet local eligibility criteria to receive incumbent worker training funds and who need to provide training to their current workforce to meet new or changing business needs.

Incumbent Worker Training is not permitted to be used to provide the occupational training a new hire needs.

FUNDING

Local Workforce Development Boards (WDB) can use up to 20% of their Adult and Dislocated Worker funds to provide for the federal share of the cost of providing IWT. For example, if a Local WDB receives \$500,000 in Adult funds and \$300,000 in Dislocated Worker funds, it may use up to \$160,000 (20% of total) for IWT. This amount can be used for IWT activities that are programmatic in nature; administrative activities must be paid out of the Board's administrative funds.

States may also provide IWT with Rapid Response funds for statewide incumbent worker training activities as part of a broader layoff aversion strategy. Generally, IWT will be provided through the local funding discussed above.

LOCAL WORKFORCE DEVELOPMENT BOARD RESPONSIBILITY

Local WDBs may choose to implement IWT; however, the WDB must establish an IWT policy as an element in its Local Plan. The Local WDB's requirements and definitions must establish which workers (or groups of workers) and which employers are eligible for incumbent worker services. Local WDBs should reference the current OWD Issuance regarding Incumbent Worker Training for additional guidance on developing this local policy.

Local WDBs must notify the Office of Workforce Development (OWD)'s Work Based Learning Coordinator to receive Central Office approval and provide the necessary information before an Incumbent Worker Training Plan Agreement is established. The information to be given includes:

1. Name of employer(s) involved and what training is being considered in order to ensure no duplication of training funds; and
2. Name and other required information regarding the chosen training service provider for data entry purposes into MoJobs; and
3. What funds have been identified to pay for the IWT (e.g., Adult, Dislocated Worker, blend of both)

OUTREACH STRATEGIES AND NON-DUPLICATION OF FUNDS

Missouri offers State-funded incumbent worker training through its Missouri Industry Training programs. State law requires that the Department of Economic Development ensure no duplication of training funds¹. To maximize resources and results, Local WDBs should prioritize working with those employers that are not eligible for, or participating in, the State's program. Doing so, will broaden the range of employers and workers that may benefit from IWT.

1 RSMO 620.809.4

Examples of industries or companies that are not qualified for Missouri Works Training include:

- Gambling establishments
- Retail trades establishments
- Food services and drinking establishments
- Public utilities
- Ethanol distillation or production
- Biodiesel production
- Healthcare
- Businesses that do not provide services in interstate commerce (outside the state)

This list is not intended to say that incumbent worker training agreements can only be entered into with businesses associated with the above industries, but rather, these are the businesses that are automatically not eligible for services through the Missouri Industry Training programs.

In order to ensure no duplication of training efforts, local WDBs must notify OWD *prior* to entering into any incumbent worker training agreement with an employer, as mentioned in the 'Local Workforce Development Board Responsibility' section of this manual. Local WDBs must also clearly flag a desired IWT plan with a company that is already participating in Missouri Industry Training activities. OWD and Missouri Industry Training partners will determine and approve that the training is being used to supplement limited resources. If the IWT plan is identified as performing duplication of services, the plan will not be approved.

EMPLOYER ELIGIBILITY

Local WDBs must determine an employer's eligibility for participating in incumbent worker training based on factors which help to evaluate whether training would increase the competitiveness of the employees or both the employees and the employer. Such factors² are to include:

- The characteristics of the individuals in the program (e.g. individuals with barriers to employment)
- Whether the training improves the labor market competitiveness of the employees or both the employees and the employer; and
- Other factors the Local WDB may consider appropriate, including:
 - The number of employees participating in the training;
 - Wage and benefit levels of those employees (both pre-and post-training earnings);
 - The existence of other training and advancement opportunities provided by the employer;
 - Credentials and skills gained as a result of the training;
 - Layoffs averted as a result of the training;
 - Utilization as part of a larger sector and/or career pathway strategy; or
 - Employer size.

These factors should be clearly identified in the Region's local plan for Incumbent Worker Training; if a Region does not have an established policy for Incumbent Worker Training, then one was must be submitted for Central Office approval *prior* to determining eligibility.

EMPLOYER PRE-AWARD REVIEW

As part of the eligibility process, a pre-award evaluation of the employer must be completed using the criteria listed:

Pre-Award Review – WIOA Section 181 and the regulations at 20 CFR 683.260 prohibit the use of WIOA funds for a training position at a business that has recently relocated if that physical relocation resulted in the loss of employment for any employee of that business. In such a case, the position must be in place for at least 120 days at the business' new location before it is eligible for Incumbent Worker Training. A pre-award review is required to verify that a business that claims to be “new” or “expanding” is not, in actuality, relocating. Document all pre-award reviews and include names under which the company does business; the name, title, and address of the company official certifying the information; and whether assistance is sought in connection with past or impending job losses at other facilities, including a review of whether Worker Adjustment and Retraining Notification (WARN) notices relating to the employer have been filed. The review may include consultation with labor organizations and others in the affected local area.

- It is State policy that the employer must have:
 - Recalled – or attempted to recall, in good faith – all employees who entered active layoff or participated in the Missouri Shared Work Unemployment Compensation Program within the past 365 days in the local labor market area; and
 - Not given notice of layoff to any employees from the same position or any substantially equivalent position.
- The training must not displace current employees.
- The company must have regulations that address safety and health issues.
- Training must not duplicate a service already available through other programs of the Missouri Department of Economic Development, including the Missouri Works Training Program.
- The wages and benefits should be appropriate based on O*NET State and National Wage Tables.
- The employer must pay its employer wage taxes.
- Training must not impair any existing agreements for services or collective bargaining agreements.
- Training Agreements cannot be for temporary or intermittent employment, or for employment in an occupation for a fee.

The pre-award determination must be documented in the DWD's statewide electronic case management system under the applicable employer record's case notes.

TRAINEE ELIGIBILITY

Additionally, in order for the employer to receive IWT funds, the individual(s) receiving the training must be :

- Employed;
- Meet the Fair Labor Standards Act (FLSA) requirements for an employer-employee relationship; and
- Have an established employment history with the employer for 6 months or more. (Employment history may include time spent as a temporary or contract worker performing work for the employer receiving IWT funds).
- Must be at least 18 years of age;
- Must be a citizen of the United States or a non-citizen whose status permits employment in the United States
- *If trainee is male born on or after January 1, 1960*, must have registered with the selective service system (exemptions for this registration are allowable).

There is one exception to the employment history requirement. That exception being, if incumbent worker training is being provided to a cohort of employees, the *majority* of the employees being trained must meet the employment history requirement³.

To document this eligibility, employment dates must be documented for each trainee and the employer must attest to meeting FLSA requirements as mentioned above.

Trainees do not have to meet eligibility requirements for career and training services for WIOA Adult and Dislocated Worker to be enrolled in IWT. The only exception would be if the trainee(s) is(are) being co-enrolled into either WIOA program. At that point, all eligibility and documentation requirements must be collected and documented per guidelines found in the current OWD Issuance for Adult and Dislocated Worker eligibility.

CASE MANAGEMENT REQUIREMENTS

TRAINEES

Trainees do not have to meet eligibility requirements for career and training services for the WIOA Adult and Dislocated Worker programs. To streamline the minimal eligibility and documentation process, a paper registration form has been created. Each worker being trained through WIOA incumbent worker training services may complete this form or the local WDB may require the person come in to complete the documentation process in the case management system.

Due to the nature of IWT, trainees are not required to complete background information or resumes in MoJobs. However, because of performance and reporting requirements for the US. Department of Labor, each trainee must be registered in the system and have an active WIOA application for IWT eligibility during the course of their training.

To complete the enrollment, the following steps are to be completed:

1. Create and/or update account; General Information link must be completed and/or updated.



2. Create a WIOA Application.



3. Select Incumbent Worker Eligibility and enter today's date to move forward.

A screenshot of a web form titled 'Application/Registration Information'. The form contains several fields and checkboxes. The 'Application Date' field is set to '05/02/2018' with a '(mm/dd/yyyy)' placeholder and a 'Today' button. Below this are four checkboxes: 'Adult Eligibility:', 'Dislocated Worker Eligibility:', 'Youth Eligibility:', and 'Incumbent Worker Eligibility:'. The 'Incumbent Worker Eligibility:' checkbox is checked. Below these is the 'Incumbent Worker Eligibility Date' field, which is empty with a '(mm/dd/yyyy)' placeholder and a 'Today' button.

4. Complete all required fields of the application, using the 'Next' button to check accuracy and completeness of information entered.
 - Verifies for the SSN and DOB will be performed through the use of the IWT Registration Form.
 - Verifies for the work authorization will be performed through the employer attestation listed on the IWT Training Plan, form DWD-PO-285.
5. On the last tab of the application, "Eligibility Summary", select 'Yes' for incumbent worker eligibility.

Incumbent Worker Eligibility: ☒ Yes ☐ No ☐ Not Applicable ☐ Inactive

Applicant meets the basic requirements for Incumbent Worker eligibility, but staff must manually set this to "Yes" and add a grant, when appropriate.

6. Under the Grants section of this tab, add the appropriate IWT grant by clicking 'Add'.

Grant Type	Grant ID	Grant Name	Local Grant Code	Date Added	Action
Incumbent Worker	46	Jeff/Frank Incumbent Worker 20%	NA		Add

Grants are established based upon the Region and the funding being used – either local funds or statewide Rapid Response funds. Depending on the scenario, multiple incumbent worker grants may be available at one time. If the correct grant is not available under this section, common troubleshooting ideas would be to 1) ensure Step 5 has been completed, or 2) check with DWD's TSU to ensure the Region and/or Job Center has access to Incumbent Worker grants.

7. Assign the designated case manager to the application, if this hasn't been done already, and click 'Finish'.
8. The day training begins:
 - Start Participation (if form has not already been completed); and
 - Add the 347-Incumbent Worker Training service code.

NOTE: The 347-IWT service is the only service that will be recorded for IWT. Due to how the case management system works, the participation date must reflect the actual begin date of the first service and it cannot be changed. Therefore, the participation date and service cannot be added to the record until training begins; a *projected begin date* cannot be entered in this instance.

INCUMBENT WORKER TRAINING SERVICE DETAILS

Each trainee enrolled in IWT must have the '347-Incumbent Worker Training' service code added to their WIOA record. This service must accurately reflect the *actual start date* of training and the *actual end date* of training. Incorrect start and end dates will result in a data element validation fail, which is reviewed annually by OWD's Quality Assurance Unit.

GRANT

Every 347-IWT service must be attached to the correct grant established for the Region providing the training. If the grant is not available, double check the "Eligibility Summary" tab of the WIOA Application and ensure the grant has been added to the record (see Step 6 from above). Grant names are based upon the Region's name and the funding source being used, any questions regarding which grant should be used can be handled locally or by contacting DWD's Work Based Learning Coordinator.

Grant: Jeff/Frank Incumbent Worker 20% ▼

CUSTOMER GROUP

Every 347-IWT service must be attached to the correct customer group. The customer group will be '92-Statewide Incumbent Worker Adult' regardless of whether the funding is coming from local formula funds or rapid response funding. If the customer group is not available, the most common troubleshooting suggestion is to ensure the individual's record has been marked with Incumbent Worker Eligibility on the WIOA Application, (see Step 5 under Case Management Requirements).



* Customer Program Group: 92 - Statewide Incumbent Worker - Adult ▼

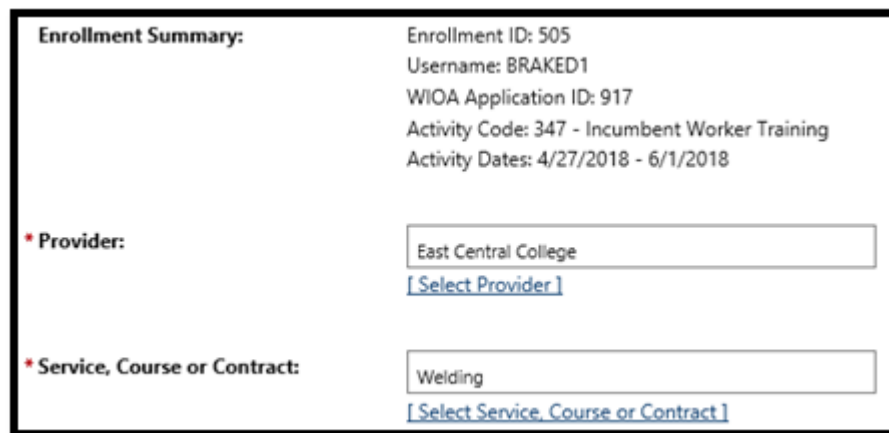
SERVICE PROVIDER TAB

SERVICE PROVIDER

All services, which includes the 347-IWT service, are tied to service providers. This could be an employer, educational training facility, or other vendor, depending on the nature of the training being provided. When setting up the 347-IWT service, the service provider must be connected to the entity providing the actual training. All service providers have been entered into the case management system and are available through the lookup features available during the service code entry process. If the service provider is not available, the Work Based Learning Coordinator should be contacted for assistance.

SERVICE, COURSE OR CONTRACT

Additionally, each service must have the correct course or contract selected. This should match the information found on the Incumbent Worker Training Plan, (DWD-PO-285). These options have also been entered into the case management system, however, if one is not found, the Work Based Learning Coordinator should be contacted for assistance.



Enrollment Summary:
Enrollment ID: 505
Username: BRAKED1
WIOA Application ID: 917
Activity Code: 347 - Incumbent Worker Training
Activity Dates: 4/27/2018 - 6/1/2018

* **Provider:** East Central College
[\[Select Provider \]](#)

* **Service, Course or Contract:** Welding
[\[Select Service, Course or Contract \]](#)

OCCUPATIONAL CODE

The last required field on the service provider tab is the Occupational Training Code. The Occupational Training Code selected must support the training being provided.

RECORDING IWT SERVICE OUTCOMES

When a participant completes training, whether successfully or not, one of the following outcomes is to be used:

- Successful Completion
- Unsuccessful Completion

OJT-related service outcomes are not to be used when closing a service received for incumbent worker training.

As a reminder, the actual end date must match the reported end date of training. These details are reviewed annually during OWD's data validation review.

PERFORMANCE ACCOUNTABILITY FOR INCUMBENT WORKER TRAINING

WIOA sec. 134(d)(4) requires the Local WDB to determine if an employer is eligible to have its employees receive IWT, furthermore, the worker(s) who receives the training is not required to meet eligibility requirements for career and training services for WIOA Adult or Dislocated worker. Due to the unique eligibility requirements, as stated by WIOA sec. 134, the Department of Labor does not consider individuals who receive IWT to be participants for inclusion in the WIOA performance accountability calculations⁴. However, states and Local WDBs are required to report outcomes of individuals who receive IWT on all primary indicators of performance, which includes 1) employed 2nd quarter after exit, 2) employed 4th quarter after exit, 3) median earnings, 4) measurable skills gains, and 5) credential attainment.

Employment in the 2nd and 4th quarters, as well as the median earnings, will be obtained through the use of wage credits associated with the individual's SSN. If an individual receiving IWT requested a pseudo-SSN, supplemental wage credits must be entered on the WIOA application. Refer to the current OWD Issuance regarding Supplemental Wage Information and Performance Accountability. The other performance measures are outlined below.

MEASURABLE SKILLS GAINS

All incumbent worker trainees who complete training will have a measurable skills gain (MSG), as the training must lead to a wage increase. Following guidelines found in TEGL 10-16 and the current OWD Issuance regarding Measurable Skills Gains, the MSG will be recorded as a training milestone. Verification of this wage increase will be collected and documented on the end monitoring report, or DWD-PO-288 form. It is possible that the specific training plan could result in a different MSG; staff are able to record as many MSGs that apply for each trainee, however, only one per program year will be reported on the Participant Individual Record Layout (PIRL).

Skill Attainment Information

Fill in the following information for the skill achievement. **Program:** Title I - Workforce Development

* **Skill Type:** Training Milestone

* **Date Skill Attained:** 05/07/2018 Today

* **Type of Achievement:** Other training milestone

[Verify | Upload | Link]

✓ Other Applicable Documentation, (specify)

Skills Gain Achievement Type Verification

☐ Case Note

☐ Hard Copy Record

☒ Other Applicable Documentation, (specify)

End Monitoring Report

CREDENTIAL ATTAINMENT

Credential attainment is reported for all participants enrolled in an education or training program (excluding those in OJT and customized training) who attained a recognized **post secondary** credential or a **secondary school diploma**⁵. Following TEGL 10-16, a list of types of acceptable credentials include the following:

4 TEGL 19-16, Performance Accountability for Incumbent Worker Training, pg 21

5 TEGL 19-16, Credential Attainment, pg 12

- Secondary school diploma or recognized equivalent
- Associate's degree
- Bachelor's degree
- Graduate degree for purposes of the VR program
- Occupational Licensure
- Occupational certificate (including Registered Apprenticeship and Career and Technical Education educational certificates)
- Occupational certification
- Other recognized certificates of industry/occupational skills completion sufficient to qualify for entry-level or advancement in employment⁶

Regardless of whether the trainee has been co-enrolled into a WIOA program, if a trainee receives a credential that meets the definition of credential attainment as a result of IWT, it must be recorded on the WIOA application and documentation must be kept with the participant's record.

GRANT OUTCOME

IWT is set up as individual grants per Region or funding source; a Grant Outcome must be recorded at the end of training. To record the grant outcome, visit the Grant Outcome section of the WIOA record.



From there, all required fields are to be completed, showing the overall successfulness of the training received.

EMPLOYER CASE MANAGEMENT REQUIREMENTS

Every employer must have the following documented in the OWD's electronic case management system.

6 TEGL 10-16, Types of Acceptable Credentials, pg 14

CASE NOTES

- Pre-award review, as stated in the 'Employer Pre-Award Review' section of this Manual.
- Case notes regarding any contact with the employer associated with the training.

SERVICE CODES

- The **E26-Incumbent Worker Training** employer service code must be recorded to the employer's record when a training agreement has been established. This service has been mapped behind the scenes to report the receipt of Incumbent Worker Training services on the PIRL, which is part of the effectiveness in serving employers performance measure.
- The **E12-Work Based Learning Contract** employer service code must be recorded to the employer's record when monitoring takes place at the end of the training.

To record the employer services, assist the correct employer account in MoJobs and follow this path: **Activities > Service Plan > Add Service**. For step by step guidance, refer to the Employer Service Desk Aid.

EQUAL OPPORTUNITY AND COMPLAINT AND GRIEVANCE NOTIFICATION

WIOA regulations require that participants receive notification of the right to pursue complaints or grievances related to Equal Opportunity issues or programmatic delivery of programs and services. To ensure that the all parties have been properly notified and provided with a copy of his/her rights and responsibilities, OWD requires a signed attestation. Form EO-15 must be used by all Local WDBs for this information. **Trainee(s)** will sign a copy of the EO-15 form, identifying themselves as a *participant* on the form. **Employers** will sign a separate copy of the EO-15 form, identifying themselves as a *recipient*.

Refer to the latest OWD Issuance regarding Equal Opportunity and WIOA Complaints and Grievances for full operating guidance.

REQUIRED PAPERWORK FOR THE IWT PROGRAM

Incumbent Worker Training operates differently than other work-based learning programs. OWD strongly recommends that its forms, listed at the end of this guide and made available online, be utilized for IWT agreements and program management. If forms with local identifiers or headers are used, they **must** include all information required on the current corresponding OWD form. The form used should record information in the same format as required on the OWD form.

At minimum, IWT must be supported using the following IWT related documentation:

- IWT Plan (DWD-PO-285)
- IWT Program Agreement (DWD-PO-286)
- IWT Budget (DWD-PO-287)
- IWT End Monitoring (DWD-PO-288)

INCUMBENT WORKER TRAINING PLAN (DWD-PO-285)

Because IWT will be different per region, employer, and training needs, the designated Training Plan form allows the employer and Local WDB to fully explain how the training fits the employer's individual needs for its workforce. This form should be completed in its entirety, as the information will determine the planned outcomes

of training and what results needs to be monitored for at the end of training. Approval for this plan, provided by DWD's Work Based Learning Coordinator, must be given *before* moving forward with a program agreement.

INCUMBENT WORKER TRAINING PROGRAM AGREEMENT (DWD-PO-286)

The IWT Program Agreement allows for the discussion of all things required under WIOA.

As part of establishing a program agreement, an employer orientation must be completed with each employer and/or employer representative to discuss the training provisions, general assurances, required end monitoring, and payment agreement.

In the orientation, staff must discuss WIOA's nondiscrimination requirements. Equal Opportunity for all participants is without regard to race, color, religion, sex, national origin, age, disability, political affiliation, belief, or state as a participant in incumbent worker training. The employer and/or employer representative must also be made aware of programmatic complaint and grievance rights and responsibilities under WIOA. To ensure IWT employers have been properly notified and provided with a copy of their rights and responsibilities, OWD requires a signed attestation using the EO-15 form, which identifies the employer as a "recipient". For additional information please see the latest guidance provided in the OWD Issuance regarding Equal Opportunity and WIOA Complaint and Grievances.

PLANNED BUDGET (DWD-PO-287)

With regard to the cost of training, Incumbent Worker Training is unlike most work-based learning options because the employer is required to pay a non-federal share of the cost of training, which can be through direct cash payments or in-kind matching contributions.

Regulations set forth in WIOA sec. 134(d)(4)(ii)(C) and (D) and TEGL 19-16 state that the employer share will be determined based upon the size of the employer and may not be *less than*:

- 10 percent of the cost, for employers with 50 or fewer employees;
- 25 percent of the cost, for employers with 51 to 100 employees; and
- 50 percent of the cost, for employers with more than 100 employees.

Local WDBs have the option to set a higher percentage in their local IWT policy, but the match cannot be less than the limits stated in federal regulations.

Before training begins, the Local WDB representative and the employer representative must outline the expected costs involved in training using the IWT Budget form (DWD-PO-287). This will enable both parties to come to an understanding and agreement on the total cost of training, how much the local WDB will reimburse, how much the employer share will be, and how the employer will pay its required non-Federal Share. The employer non-federal share must not be paid by the Federal government under another federal award. All expenses paid with regard to the training must be reasonable, necessary, and allowable and conform to the regulations found in the Uniformed Guidance. Guidance regarding cost sharing or matching can be found at 2 CFR §200.306.

Due to the possibility of the employer share changing throughout the course of training, the cost of training and employer contribution must be reviewed at the end of training to determine the agreed upon match has been met. Should the employer's share not meet the agreed upon match, the employer will be responsible for

repaying the difference. Official payroll records, time and attendance records, invoices with supporting payment documentations, etc., must be retained and utilized to determine the amount of the employer's share.

MONITORING (DWD-PO-288)

For program and financial compliance, monitoring must take place at the end of training. Monitoring allows the local WDB to determine if outcomes agreed upon in the Training Plan were met and that the employer non-federal share is still appropriate and has been met accordingly.

Monitoring is documented on the DWD-PO-288 form during onsite monitoring and through the use of Case Notes. When performing the monitoring of IWT, staff must verify and obtain copies of all applicable paperwork to support the information being reviewed.

For the completion of training, a list from the training facility stating who completed training and what credential was obtained or copies of the actual credential and/or certificate of completion, may be used to document completion and credential attainment.

For the increase in wages, copies of payroll documents are to be obtained.

To document layoff aversion, payroll documents confirming the trainee(s) continues to be employed are to be obtained.

To evaluate an employer's performance to determine suitability for future agreements, ascertain the following:

- Did monitoring identify training as poor or incomplete;
- Was there an increase in wages after training;
- Was the participant dismissed after training or during the follow-up period; *and*
- Were there any participant or employer grievances?

The Local WDB or its designee must conduct sub-state monitoring of its programs, including employer fiscal records, as outlined in the Statewide Sub-state Monitoring Policy. OWD will monitor for program compliance through the statewide electronic case management system and Local WDB financial records during the annual Programmatic/Financial Monitoring.

FINANCIAL REPORTING

Local WDBs must report IWT as a program cost on their monthly progress reports required by the OWD Financial Manual (page 58). Additionally, Local WDB must report the employer share amount in the 'Employer Contribution' section located on the monthly CPR, as this information is required for the federal ETA-9130 financial report.

QUESTIONS

Any questions regarding the execution of IWT, should first be directed to the appropriate contact person at the local level. Should additional assistance be needed, questions can be directed to the Work Based Learning Coordinator. A current list of all OWD program contacts is available at <https://jobs.mo.gov/dwdcomms>.

APPLICABLE FORMS

All incumbent worker training forms are available online at <https://jobs.mo.gov/dwdprograms>.

DWD-PO-285 Incumbent Worker Training Plan
DWD-PO-286 Incumbent Worker Training Program Agreement
DWD-PO-287 Incumbent Worker Training Budget
DWD-PO-288 Incumbent Worker Training End Monitoring
EO-15 EO and WIOA Program Complaint and Grievance Notice
Incumbent Worker Training Registration Form

RELATED ISSUANCES

All services provided using WIOA funding must adhere to established policies in current OWD Issuances. All OWD Issuances can be found at <https://jobs.mo.gov/dwdissuances>. The following Issuances are specific to IWT, however all guidance applies, regardless of being listed below.

02-2017: Statewide Case Note Policy
11-2017: Supplemental Wage Information for WIOA Performance Reporting Policy
16-2017: Disseminating Notices For Equal Opportunity For EO and Complaint & Grievances
19-2017: Measurable Skills Gains Policy
22-2017: Effectiveness in Serving Employers Performance Measure
23-2017: Incumbent Worker Training Policy
28-2017: Credential Attainment Policy
04-2018: Participant Activity Codes & Definitions